

1 ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
2  
3 MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division  
4  
5 CHRISTIAAN HIGHSMITH (CABN 296282)  
DAVID WARD (CABN 239504)  
Assistant United States Attorneys  
6 MATTHEW CHOU (CABN 325199)  
Special Assistant United States Attorney  
7

8 450 Golden Gate Avenue, Box 36055  
9 San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7230  
christiaan.highsmith@usdoj.gov  
david.ward@usdoj.gov  
matthew.chou2@usdoj.gov

11 Attorneys for United States of America  
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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) NO. CR 20-00249 RS  
17 Plaintiff, )  
18 v. ) **UNITED STATES' PROPOSED ADDITIONAL  
19 ROWLAND MARCUS ANDRADE ) VOIR DIRE QUESTIONS**  
20 Defendant. )  
21 ) Dept.: Courtroom 3 – 17th Floor  
Judge: Hon. Richard Seeborg  
Trial Date: February 10, 2025  
22 )

23 During the pretrial conference in this matter, the Court permitted the parties to file proposed voir  
24 dire questions. *Dkt. 492.* The United States respectfully submits the following proposed questions:

- 25 1. Do any of the jurors happen to know any of the other prospective jurors?
- 26 2. Would sitting as a juror in this case cause a significant financial hardship for you?
- 27 3. Much of the evidence in this trial will be in the form of documents, such as emails, text  
28 messages, and news articles. Witnesses will discuss those documents, and they will be

1 displayed on the screen in front of you. Is there anything that would make it difficult for you  
2 to read and understand large amounts of text written in English?

3 4. Have you ever worked at a startup or in venture capital? If so, what was your role?

4 5. The U.S. Department of Justice, the FBI, and federal law enforcement in general have all  
5 been in the news recently. Although this case is in San Francisco and results from a San  
6 Francisco-based investigation, do you have such strong feelings about the Federal  
7 Government that you would not be able to be fair in evaluating the evidence and witness  
8 testimony in this case?

9 6. Have you or a close friend or family member had any prior experience with Jack Abramoff,  
10 or strong opinions or feelings about him, that would influence your ability to be a fair and  
11 impartial juror in this case?

12 7. In this case you may hear from witnesses who also committed crimes and who may be  
13 seeking some leniency in their own cases for providing testimony or evidence in this case.  
14 While the law provides for you to view those witnesses with scrutiny, would you tend to  
15 ignore those witnesses because you don't believe that the law should allow such witnesses to  
16 testify?

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18 DATED: January 24, 2025

Respectfully submitted,

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20 ISMAIL J. RAMSEY  
United States Attorney

21  
22 /s/  
23 CHRISTIAAN HIGHSMITH  
DAVID J. WARD  
Assistant United States Attorneys

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25 MATTHEW CHOU  
Special Assistant United States Attorney